



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**REGION 10**

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OFFICE OF  
ECOSYSTEMS, TRIBAL AND  
PUBLIC AFFAIRS

March 10, 2015

Ms. Leslie A. Grey  
Environmental Protection Specialist AAL-614  
Federal Aviation Administration  
Alaskan Region, Airports Division  
222 W. 7<sup>th</sup> Avenue, #14  
Anchorage, Alaska 99513-7587

Dear Ms. Grey:

We have reviewed the Federal Aviation Administration Draft Environmental Impact Statement and Section 4(f) Evaluation for the Angoon Airport (EPA Project # 08-057-FAA) in Angoon, Alaska. Our review was conducted in accordance with our responsibilities under Section 309 of the Clean Air Act and the National Environmental Policy Act. Based on our review, we have assigned a rating of EC-1 (Environmental Concerns-Adequate Information) to the preferred alternative. For your reference, a copy of the rating system we used to conduct our review is enclosed.

We believe that the selection of the preferred alternative (Alternative 12a with 12a Access) is environmentally preferable to the other airport locations and access roads in nearly all resource categories. In addition to avoiding designated Wilderness, it requires substantially less waterbody crossings, including no crossing of Favorite Creek. This alternative would result in less fill, less impervious surface, less terrain disturbance, and fewer culverts, stream diversions, truck trips and barge trips. We also note that it is the least costly alternative and is similar to other alternatives in instrument approach capability, minimums for visibility, and year-round availability.

We note that although the Draft EIS concludes that none of the action alternatives would result in "unacceptable adverse impacts to non-wetland waters of the U.S. per Clean Water Act Section 404(b)(1) guidelines," only the Least Environmentally Damaging Practicable Alternative may be permitted by the U.S. Army Corps of Engineers. Based on the analysis in the EIS, there is substantial difference in impacts to aquatic resources between the preferred alternative and the other action alternatives, with the preferred alternative resulting in substantially fewer impacts to aquatic resources. We believe that overall, the preferred alternative is environmentally preferable because of the reasons listed above and because the preferred alternative will likely be the LEDPA, or will more closely resemble the LEDPA, compared to the other action alternatives. We support the selection of this alternative by the FAA in the Final EIS and Record of Decision.

We also believe the Draft EIS does a satisfactory job of analyzing a range of reasonable alternatives for a land-based airport in or near the community of Angoon. It is clear that your agency went through an extensive alternative analysis screening process and involved many stakeholders in this process. In addition, the document and electronic version (as an interactive Adobe .pdf file) is very reader friendly and useful to interested stakeholders, particularly the sidebar boxes, hyperlinks and navigation buttons.

We do have concerns, however, regarding the impact that the preferred alternative has on the amount and accessibility of Alaska Native Claims Settlement Act village corporation and private land, including native allotments, which are in close vicinity to the community. These lands are currently used for a variety of purposes, including subsistence activities. There is a trend in Alaska for private and corporation lands that are accessible to owners and shareholders to be utilized for public infrastructure projects. While these projects often provide benefits to residents, such as safer and more reliable air service, there is often a trade-off or loss of other uses. The loss of easily accessible subsistence areas is particularly detrimental for low-income and disabled residents. It is not clear if this was fully evaluated in the EIS. We recommend additional work to identify appropriate mitigation for these losses and monitoring to ensure that the mitigation being implemented is effective.

We are also concerned that, in comparison to the other action alternatives, the preferred alternative requires substantially more vegetation removal, resulting in a much more concentrated stream geomorphic effect and substantial loss of natural stream function for Stream 10. We recommend that the FAA work closely with the Alaska Department of Transportation and Public Facilities and other stakeholders to determine if any additional avoidance or minimization can be included in the project design. For impacts that cannot be avoided or reduced, appropriate mitigation must be identified. For impacts that cannot be mitigated, compensation should be applied. We recommend that a robust draft compensation plan be included in the Final EIS.

Finally, we have two specific recommendations that we hope will provide more clarity for the reader. First, in the Executive Summary and Chapter 1, the access route for Alternative 3a is not identified. We recommend that this be corrected. Second, while we recognize that information relating to Alaska National Interest Lands Conservation Act is very thorough, we believe it is important that the EIS also clearly articulate that agencies must also comply with other applicable laws and regulations. We recommend that this be clarified in the Final EIS.

Thank you for the opportunity to review this Draft EIS. We look forward to participating in discussions related to mitigation for project impacts as the project moves forward. If you have questions about our comments, please contact me at (206) 553-1601 or by electronic mail at [reichgott.christine@epa.gov](mailto:reichgott.christine@epa.gov), or you may contact Jennifer Curtis of my staff in Anchorage at (907) 271-6324 or by electronic mail at [curtis.jennifer@epa.gov](mailto:curtis.jennifer@epa.gov).

Sincerely,



Christine B. Reichgott, Manager  
Environmental Review and Sediment Management Unit

Enclosure:

1. U.S. Environmental Protection Agency Rating System for Draft Environmental Impact Statements

**U.S. Environmental Protection Agency Rating System for  
Draft Environmental Impact Statements  
Definitions and Follow-Up Action\***

**Environmental Impact of the Action**

**LO – Lack of Objections**

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

**EC – Environmental Concerns**

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

**EO – Environmental Objections**

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

**EU – Environmentally Unsatisfactory**

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

**Adequacy of the Impact Statement**

**Category 1 – Adequate**

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

**Category 2 – Insufficient Information**

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

**Category 3 – Inadequate**

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.